

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: )  
Marcia Samuel, ) 16-11833-amc  
)  
)  
Chapter 13 Debtor. ) Re: Docket 81

**REPLY TO TRUSTEE'S MOTION TO DISMISS**

1. The Debtor admits it is in arrears to some degree but is reconciling bank statements and payments at this time.
2. The Debtor will cure arrears either by modified plan or direct payment prior to the hearing.
3. Accordingly, the Debtor asks that the motion be denied.

February 17, 2020

BILLION LAW

/s/ Mark M. Billion

---

Mark M. Billion (PA Bar No. 315152)  
922 New Road; Suite 2  
Wilmington, DE 19805  
Tel: 302.428.9400  
Fax: 302.450.4040  
markbillion@billionlaw.com

*For the Debtor*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	)	
Marcia Samuel,	)	16-11833-amc
	)	
	)	
Chapter 13 Debtor.	)	Re: Docket 81

**COS: REPLY TO TRUSTEE'S MOTION TO DISMISS**

I, Mark M. Billion, Esquire, in the within matter, do hereby certify that on February 17, 2020, I caused one copy of the captioned document to be served on all parties having appeared via CM/ECF.

February 17, 2020

BILLION LAW

/s/ Mark M. Billion

---

Mark M. Billion (DE Bar No. 5263)  
922 New Road; Suite 2  
Wilmington, DE 19805  
Tel: 302.428.9400  
Fax: 302.450.4040  
markbillion@billionlaw.com

*For the Debtor*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	)	
Marcia Samuel,	)	16-11833-amc
	)	
	)	
Chapter 13 Debtor.	)	Re: Docket 81

**ORDER: REPLY TO TRUSTEE'S MOTION TO DISMISS**

Upon the captioned motion and any responses thereto, the captioned motion is hereby  
DENIED.

Dated: \_\_\_\_\_, 2020 \_\_\_\_\_, J.